

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

**IN RE: CENTURYLINK SALES
PRACTICES AND SECURITIES
LITIGATION**

MDL No. 17-2795 (MJD/KMM)

This Document Relates to:

17-2832, 17-4613, 17-4614, 17-4615,
17-4616, 17-4617, 17-4618, 17-4619,
17-4622, 17-4943, 17-4944, 17-4945,
17-4947, 17-5001, 17-5046, 18-1573,
18-1572, 18-1565, 18-1562

**PLAINTIFFS' NOTICE OF SUPPLEMENTAL AUTHORITY IN SUPPORT OF
OPPOSITION TO DEFENDANT AND PROPOSED INTERVENORS' MOTION
TO COMPEL ARBITRATION AND ENFORCE CLASS-ACTION WAIVERS**

Plaintiffs submit the attached Award of Arbitration ruling, finding that the plaintiff was not bound to arbitration by either the Qwest Internet Agreement or 2017 Internet Agreement on the grounds of unconscionability. Ex. A (Award of Arbitrator in the matter of *William Wardlow v. Qwest Corp.*, Case No. 01-18-00003-7341, Mar. 18, 2019.) Defendant CenturyLink, Inc. ("CenturyLink") has asserted here that the Qwest Internet Agreement binds Plaintiffs Allison, Anderson, Aragon, Chavez, Dahib, Denniston, Fitch, Glodowski, Lahdahl, Lavelle-Register, Lodestein, Lucero, O'Donnell, Parkes, Rocha, Romero, Stucker, Tyler, and Weigt to arbitration. CenturyLink has asserted the 2017 Internet Agreement binds Plaintiffs Clayton, Glodowski, Marchese, and Scott to arbitration.

In the decision, the Hon. David W. Casey, American Arbitration Association, reported that after review of the parties' submissions and considering their arguments at

the hearing, which had “thoroughly addressed the various terms of the contract and the unconscionability issue,” he found that the plaintiff William Wardlow was not obligated to arbitrate because, “arbitration clause is unconscionable.” He concluded that “Consequently, the arbitration clause is unenforceable and this case is not arbitrable.”

Dated: May 8, 2019

Respectfully submitted

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